



February 25, 2011

Commission's Secretary, Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB-06-36, Certification of CPNI Filing

Dear Ms. Dortch:

This letter serves as of "**Certification of CPNI Filing**", as ordered in EB Docket No 06-36.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Debra A. Shaw".

Debra A. Shaw, CPA
Controller

Cc: Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington DC 20554,
fcc@BCPIWEB.com



March 1, 2011

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2010**

Date filed: **March 1, 2011**

Name of company(s) covered by this certification: **Allied Telecom Group, LLC**

Form 499 Filer ID: **825655**

Name of signatory: **Ken D. Williams**

Title of signatory: **CEO**

I Ken D. Williams certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Signed Ken D. Williams

Accompanying Statement

Annual CPNI Compliance Certification Procedures

- 1) **To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without customer approval, the Company employs the following procedures.**

The company does not market services based on CPNI; thus, it does not use CPNI without customer approval.

- 2) **To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Company employs the following procedures.**

The Company does not use, disclose or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, the Company does not send notifications or request corresponding approvals from customers. The company does not use joint venture partners or independent contractors for marketing purposes.

- 3) **To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Company employs the following procedures.**

The Company does not use, disclose or permit access to CPNI except in occasional situations during inbound calls from customers (as discussed below) or as required by law. The Company teaches its employees that they are not to use, disclose or permit access to CPNI in any other situations and the Company informs the employees of the disciplinary action that would be taken if they breach those rules. This training and education take the form of in-house seminars. The disciplinary action could be retraining, suspension or dismissal. The Company does not use CPNI for marketing, so it does not need to maintain records of marketing campaigns for purposes of the CPNI rules. We have a supervisory review process regarding compliance with the CPNI rules; and we retain records of compliance as required by the rules.

- 4) **To ensure compliance with Section 64.2010 of the FCC's CPNI rules, concerning safeguards for disclosing CPNI, the company has employed the following procedures.**

Telephone access to call detail information is provided only in accordance with the guidelines established in the CPNI rules. Telephone access to non-call detail information is provided after the customer is authenticated. The company does not provide online access to CPNI. The Company has not modified any contracts with business customers to provide alternative authentication regimes. Whenever account

information changes as specified in Section 64.2010, the Company immediately notifies the customer, usually via email to the existing address of record.

- 5) To ensure compliance with Section 64.2011 of the FCC's CPNI rules, concerning notifications of security breaches, the Company employs the following procedures.**

All staff have been trained in procedures to follow to report breaches internally. We have had no breaches to date. When a breach is confirmed, the appropriate regulatory personnel are prepared to make the required notifications to the United State Secret Service, the Federal Bureau of Investigation, and the customer, as required and permitted under Section 64.2011. Records of such breaches and the corresponding notifications are maintained for at least two years.